

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;  
JAMISON J., by and through his next friend, Clara Lewis;  
DESIREE, RENEE, TYSON, and MONIQUE P., by and through  
their next friend, Sylvia Forster; JOHN A., by and through his  
next friend, James D. Johnson; CODY B., by and through his  
next friend, Sharon Scott; MARY, TOM, MATTHEW, and  
DANA W., by and through their next friend, Zelatra W.; AND  
SAM H., by and through his next friend, Yvette Bullock; on their  
own behalf and behalf of all others similarly situated,

Plaintiffs.

CIVIL ACTION NO.  
3:04-CV-251-TSL-FKB

v.

PHIL BRYANT, as Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director of the Department  
of Human Services; AND BILLY MANGOLD, as Director of  
the Division of Family and Children's Services,

Defendants.

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**NOTICE OF DEPOSITION**

PLEASE TAKE NOTICE that counsel for plaintiffs will take the deposition upon oral examination of Kristi Plotner, former Deputy Commissioner of Administration for the Department of Child Protective Services, on Wednesday, November 28, 2018, beginning at 1:00 p.m. at the law offices of Bradley Arant Boult Cummings, LLP, 188 East Capital Street, Suite 400, Jackson, Mississippi, 39201, by a court reporter duly authorized to administer oaths.

Plaintiffs request that deponent bring to said deposition all documents described in Exhibit A attached hereto.

RESPECTFULLY SUBMITTED, this, 14th day of November, 2018.

s/ Marcia Robinson Lowry  
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Erica A. Reed (*pro hac vice*)  
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*PLAINTIFFS' COUNSEL*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system which will deliver copies to all counsel of record

s/ Marcia Robinson Lowry  
Marcia Robinson Lowry (*pro hac vice*)

**EXHIBIT A**

Documents within your possession, custody, or control that were not previously produced and *that contain your handwritten notes* concerning any of the below-listed subject areas:

1. Budget requests submitted by Mississippi Department of Child Protection Services to the Mississippi Legislature for SFY 2019;
2. The SFY 2018 deficit;
3. The SFY 2019 deficit;
4. Efforts to secure additional funding for SFY 2019.